



July 14, 2017

Central Valley RWQCB  
Rancho Cordova/Fresno, CA

RE: Amendments to Waste Discharge Requirements order R5-2015-0127

To Whom it May Concern,

The undersigned organizations submit these comments on proposed amendments to Waste Discharge Requirements order R5-2015-0127 for the California Resources Corporation and North Kern Water Storage District's produced water reclamation project.

We have strong concerns with and therefore oppose discharge specification C.9 that "the Lerdo Canal and Rosedale Basin shall be free of visible oil or oil accumulation, or effectively netted to preclude the entry of wildlife." First, we are concerned that "treated" wastewater still contains hydrocarbons that are passed into the water district's system. The amendment inappropriately proposes a choice between one of two types of protection, i.e. being free of visible oil or protecting wildlife. As only one of the two criteria must be met, it is allowable for visible oil/oil accumulation to be present or no netting to protect wildlife. It should not be a choice between one or the other, both should be required. However, if the water is treated to a level so that it does not contain toxic chemicals or hydrocarbons, we would do not believe netting would be required.

The proposed amendment is too limited and does not fulfill the Regional Board's mandate to protect public resources pursuant to the Basin Plan.

Sincerely,

Keith Nakatani  
Clean Water Action

Bill Allayaud  
Environmental Working Group

Bruce Baizel  
Earthworks

Patricia McPherson  
Grassroots Coalition

Tanja Srebotnjak  
Harvey Mudd College

Paul Ferrazzi  
Citizens Coalition for a Safe Community